CORRES CONTROL
INCOMING LTR NO

4194 RF 91

DUE DATE 11-21-91

ACTION Kersh

DIST	LTR	ENC
BENJAMIN A		
BRETZKE, J C		
BURLINGAME, A H		
COPP, R D		
CROUCHER, D W		
DAVIS, J G		
EVERED, J E	AOT	
FERRERA, D W		
FERRIS, L R		
FRAIKOR, F J		
FRANCIS, G E		
GOODWIN, R		
HANNI, B J		
HEALY, T J		
IDEKER, E H		
JENS, J P		
KERSH, J M	X	X
KIRBY, W A		
KRIEG, D		
KUESTER A W		
LEE, E M		
MAJESTIC, J R		
MARX, G E		
MATHEWS, T A		
MEURRENS, B E		
MORGAN, R V		
PIZZUTO, V M		
POTTER, G L		
SAFFELL, B F		
SANDLIN, N B		
SWANSON E R	X	X
WIEBE, J S		
WILKINSON, R B		
WILSON, J M		
YOUNG E R		
ZANE, J O		
Ogg R	X	X
Sobchak L	X	X
meyers w	X	X
[illegible]	X	X
Hobbs F	X	X
Farrell R	X	X
Ferguson D	X	X
CORRES CONTROL	X	X
TRAFFIC		

Reviewed for Addressee
Corres Control RFP
10-21-91 [signature]
DATE BY

Ref Ltr #

RF 46522 (Rev 6/91)

000028042

States Government

Memorandum

Department of Energy

Rocky Flats Office

Oct 21 11 05 AM '91

ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

OCT 1991
RECEIVED

OCT 18 1991

ERD BKT 8715

Draft Pre-assessment Site Investigation, Waste Systems Evaporator Building 374, Work Plan

J M. Kersh, Associate General Manager
Environmental Restoration and Waste Management
EG&G Rocky Flats, Inc

Please find attached DOE comments on the August 1991, document entitled, "Draft Pre-assessment Site Investigation, Waste Systems Evaporator Building 374, Work Plan for Rocky Flats Plant, Golden, Colorado," prepared by Engineering-Science, Inc for EG&G Rocky Flats, Inc We request that responses to comments be forwarded to DOE RFO ERD prior to completing the next version of the work plan

If there are any questions or concerns, Bruce Thatcher of my staff may be contacted at extension 3532 Note that Mr Thatcher is the DOE/RFO/ERD project manager for OUs 8 and 10 (and, therefore, SWMUs 135, 172, and 206)

David P Simonson
Assistant Manager
for Environmental Management

Attachment

cc w/o Attachment.
F Lockhart, DOE/RFO
R. Schassburger, DOE/RFO
B Thatcher, DOE/RFO
R Ogg, EG&G/RF
L. Sobchak, EG&G/RF

ADMIN RECORD

A-000-000156

LOCATION	COMMENT
p 1-2	What is meant by "temporary" groundwater monitoring wells? If possible, they should be located such that their subsequent removal is not required due to construction activities
p 2-1, par 3	It is stated that "it is not the intent of this work plan to acquire sufficient data for the RCRA facility investigation (RFI) or the the CERCLA remedial investigation (RI) for the sites" If portions of SWMUs are to be located within construction areas, it would be prudent to acquire, at a minimum, data necessary to satisfy Attachment II Table 5 of the IAG for SWMUs 135, 172 and 206 in the those areas. If this is not done, it may not be possible to obtain the information required by the IAG once construction has been completed Thus, I recommend that data sufficient for compliance with the IAG and the RFI/RI reports (and the CMS/FS reports) be acquired prior to initiating construction activities. Furthermore, all data collection should follow the appropriate RFP Standard Operating Procedures (SOPs) as is stated in the Field Sampling Plan (Section 7)
p 3-12, Sec 3 2 1 1, par 2	The IAG states on page 23 of Attachment II with regard to SWMU No 135 that the location of site 135 as either north or south of Building 374 shall be verified The first sentence of this paragraph states that "assuming that the location of SWMU 135 is north of Building 374" This needs to be verified, not assumed.
p 3-16, Sec. 3 2 1 3, par 2	Where was the removed road bed material taken?
p 5-2, Sec 5 3	The EPA (1987) document goes well beyond the analytical levels presented in this portion of the text. It does not appear that the DQO process was used to develop this work plan. For example, none of the proposed sampling in the work plan is supported by statistical analyses I recommend that the DQO process in EPA (1987) be used more effectively to prepare a work plan for these activities The description of DQOs in this section of the work plan appears to be no more than lip service
p 6-2, SWMU	Contaminants listed on page 3-12 for SWMU 135 135 include only chromates and algicide However, neither subsurface nor surface soil samples are being analyzed for algicide I recommend that algicides be included on the parameter list for soils Table 6.2 on page 6-4 should be modified accordingly In addition, there is an inconsistency between the analyte lists for subsurface and surface soil samples. Subsurface samples will be analyzed for only HSL metals, while surface samples will be analyzed for HSL metals, VOCs, semi-VOCs, and radionuclides. What is the justification for the additional parameters for the surface samples? Shouldn't some fraction of all samples collected in the PSZ be analyzed for radionuclides in addition to the field screening? What is the statistical basis for the proposed surface and subsurface soil sampling? One surface soil sample from the ditch seems grossly inadequate
p 6-4, Table 6 2	Analyses for the surface soil sample at SWMU No 135 are not included in this table

p 6-8, SWMU 172

Contaminants listed on page 3-16 for SWMU 172 include plutonium, oils and solvents (such as carbon tetrachloride) Also, americium should be included as daughter product. However, analysis of subsurface soil samples for VOCs will be based on field screening and will be limited to one sample per borehole I recommend that soil samples be collected for laboratory VOC analysis the same as the other analytes In addition, I recommend that all soil samples be analyzed for total petroleum hydrocarbons Table 6 2 on page 6-4 should be modified accordingly

What is the statistical basis for the proposed surface and subsurface soil sampling? One surface soil sample from the ditch seems grossly inadequate

p 6-12, SWMU 206

It is stated on page 3-19 for SWMU 206 that "it is not clear what constituents in the water would be considered hazardous" Therefore, it should be assumed that the constituents are unknown.

What is the basis for including chromium in the subsurface soil analysis rather the entire list of HSL metals? Since this SWMU resides within the PSZ, shouldn't a fraction of all samples be analyzed for radionuclides?

State the background concentration of nitrate in soil that will be used to determine which samples are sent for laboratory analysis

What is the statistical basis for the proposed subsurface soil sampling?

p 6-14, SWMU 206, monitoring wells

See my comment on page 1-2 above

What is the basis for the selection of only two groundwater monitoring wells (e g , three data points, at a minimum, are required to map the water table)?

What is the basis for the location of the groundwater monitoring wells? If there are nearby monitoring wells that were used to select the number and location of the proposed wells, this information should be included in both the text and Figure 6 4 of the work plan. Information should include water table elevation/contours, water quality data and other pertinent data such as whether any of the wells have been dry and when they were dry

State the analytes that will be analyzed from water samples collected from the proposed monitoring wells They should be consistent with the analytes for the subsurface soil samples. Also, state the number of rounds of samples that will be collected from these wells prior to abandonment.

p 6-15, Sec 6 6 1, par 1

As shown on Table 3 2 on page 3-14, SWMUs 135, 172 and 188 are in OUs where there is EPA/CDH joint lead, therefore, the BRAP should be consistent with that described by CERCLA, the NCP and the IAG.

p 6-15, Sec 6 6 1, par 1

The BRAP will include dose calculations from radionuclides consistent with DOE Order 5400 5 and Chapter 10 of the 1989 EPA document entitled, "Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual (part A), Interim Final"

p 6-15, Sec 6 6 2	Chemicals of concern will be selected from the procedures developed by the RFP Risk Assessment Technical Working Group You should contact D Smith (ext. 5958) and L. Woods (ext 5417), both of EG&G Rocky Flats, Inc , for the procedures agreed to by DOE, EPA and CDH Also, if an ecological assessment is to be performed, L Woods should be contacted for criteria for taxon selection also developed by the RFP Risk Assessment Technical Working Group I recommend that L Woods be consulted regarding the need of an ecological assessment for this project. Note that paragraph 2 of Section 6 6 4 on page 6-16 indicates that an ecological assessment (or environmental evaluation) will be included If this is so, the work plan requires much more detail regarding the planned ecological activities
p 6-18, Table 6 5	Note that the SI Report table of contents does not include the BRAP described n the text on pages 6-15 to 6-17 The description of the BRAP indicates that it may go well beyond "Worker Exposure Evaluation" (Section 7 0)
Section 7	As stated in the NCP [40CFR300 430(b)(8)(i)], the field sampling plan "describes the number, type and location of samples" in addition to the types of analyses The IAG also has specific requirements for a field sampling plan described on page 25 of Attachment II I recommend that the field sampling plan in this work plan conform to all the applicable requirements including RCRA, CERCLA, the NCP and the IAG
p 7-1, Sec 7 1 2	Where cultural interference may make magnetic and EM clearing difficult or impossible, consideration should be given to using ground penetrating radar
p 7-5, Sec 7 1 4, par 2 and 3	I very strongly recommend that all soil samples collected for VOC analyses be obtained with ring samplers to minimize the loss of VOCs Opening a a standard split-spoon sampler and placing the soil into a sample bottle is no longer considered adequate for VOC analysis